

EXHIBIT 11



**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

WELLCOMEMAT, LLC,

Plaintiff,

v.

AYLO HOLDINGS S.à r.l., AYLO
FREESITES LTD, AYLO PREMIUM,
LTD, 9219-1568 QUEBEC, INC., and
JARROD BELTRAN,

Defendants.

C.A. No. 2:23-cv-483

JURY TRIAL DEMANDED

PLAINTIFF’S VENUE-RELATED INTERROGATORIES TO AYLO

Pursuant to Federal Rules of Civil Procedure Rules 26 and 33 and the Rules and Orders of this Court, Plaintiff WellcomeMat, LLC (“WellcomeMat”) serves the following Interrogatories on Defendants Aylo Holdings S.à r.l., Aylo Freesites Ltd., Aylo Premium, Ltd., and 9219-1568 Quebec, Inc. (collectively, “Aylo”) to be answered within thirty (30) days and in the manner required by the Federal Rules of Civil Procedure.

DEFINITIONS

1. The term “Accused Platforms” refers to the Accused Platforms as described in WellcomeMat’s Amended Complaint, Dkt. No. 25, including those servers/software utilized by Aylo to offer an online video platform that enables Content Partners to upload video files and add, modify, and delete video cue point information associated with those files, which enables visitors of such website to select and utilize such cue points to find, watch/stream, and share desired content.

2. The term “Action Tags” refers to the cue point information that You define as

“indicators you can add to your video’s player bar to help users get to their favorite parts easily,” as described in WellcomeMat’s Amended Complaint, Dkt. No. 25.

3. The person “Alex Rojas” refers to the person who, as of February 13, 2024, claims to be a former Senior Software Engineer employed by You between December 2012 and October 2015. <https://www.linkedin.com/in/alex-rojas-81b60261/>.

4. The terms “Aylo,” “Defendants,” “You,” or “Your” means collectively and/or individually Defendants Aylo Holdings S.à r.l., Aylo Freesites Ltd., Aylo Premium, Ltd., and 9219-1568 Quebec, Inc., including any of their past and present parents, subsidiaries, affiliates, divisions, predecessors, successors or assignees, and their respective officers, directors, employees, consultants, representatives, agents, attorneys, or anyone acting or purporting to act on their behalf or under their control.

5. The term “Content Partner” means any user of the Pornhub website or other Accused Platforms who has joined Your Content Partner Program or Model Partner Program as described in WellcomeMat’s Amended Complaint, Dkt. No. 25, and in Pornhub’s Terms of Service, <https://www.pornhub.com/information/terms#terms>.

6. The term “Eastern District of Texas” refers to the seven divisions described in 28 U.S.C. § 124(c).

7. The term “employee” refers to and includes any current or former, full- or part-time, flex or seasonal employees, contractors, volunteers, interns, lobbyists, officers, directors, and other agents and/or representatives.

8. “Identify,” when used with reference to:

- a. an individual person, means to state his or her full name, present or last known employer, job title, general job description, and present or last known residence